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*Proposed Counsel for  
Debtors and Debtors-in-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>BALKAN EXPRESS, LLC</b>	§	
	§	<b>Case No. 25-41544</b>
<b>Debtor.<sup>1</sup></b>	§	

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<b>IN RE:</b>	§	<b>Chapter 11</b>
	§	
<b>BALKAN LOGISTICS, LLC</b>	§	
	§	<b>Case No. 25-41545</b>
<b>Debtor.<sup>2</sup></b>	§	

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**NOTICE OF FILING OF REVISED BUDGET**

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Balkan Express, LLC (the “Debtor”), a debtor and debtor in possession in the above-referenced bankruptcy proceeding (the “Chapter 11 Case”), files this *Notice of Filing of Revised Budget* and respectfully gives notice as follows:

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<sup>1</sup> Balkan Express, LLC’s mailing address is 2560 E Long Ave, Fort Worth, Texas 76137. The last four digits of its EIN are 3974.

<sup>2</sup> Balkan Logistics, LLC’s mailing address is 2560 E Long Ave, Fort Worth, Texas 76137. The last four digits of its EIN are 8202.

1. On May 1, 2025, the Debtor filed *Debtor's Emergency Motion for Interim and Final Orders Authorizing the Debtor to (i) Maintain and Continue to Operate under Factoring and Security Agreement in Order to Sell Accounts Post-Petition to Compass Funding Solutions LLC Pursuant to 11 U.S.C. § 363(b), (c), (f), and (m); (ii) Obtain Working Capital from Compass Funding Solutions LLC Pursuant to 11 U.S.C. § 364(c)(1), (c)(2), & (d)(1); (iii) Grant Compass Funding Solutions LLC Adequate Protection in the Form of First Priority Liens and Security Interests on Property of the Debtor's Estate Pursuant to 11 U.S.C. §§ 361 and 363(e); (iv) Modify the Automatic Stay; and (v) Grant Such Other Related Relief* [Docket No. 10 in Case No. 25-41544] (the "Motion"). Attached to the Motion was a proposed interim order granting the Motion [Docket No. 10-1] (the "Proposed Interim Order") to which the Debtor's cash flow budget was attached as Exhibit A (the "Budget").

2. **PLEASE TAKE NOTICE** that attached hereto as **Exhibit A** is a revised Budget to be considered in connection with the May 2, 2025 hearing on the Motion.

Dated: May 2, 2025

Respectfully submitted,

/s/ Joshua N. Eppich

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PROPOSED COUNSEL FOR THE DEBTORS  
AND DEBTORS IN POSSESSION

**CERTIFICATE OF SERVICE**

I certify that on May 2, 2025, a true and correct copy of the foregoing document was served via the Court's CM/ECF system.

/s/ Eric T. Haitz  
Eric T. Haitz

# **EXHIBIT A**

**Balkan Combined Budget  
Weekly Forecast**

	Week of 5/3/25	Week of 5/10/25	Week of 5/17/25	Week of 5/24/25	Week of 5/31/25	Week of 6/7/25
Starting Cash Balance	130,000.00					
<b>Cash Collections</b>						
Outstanding AR Claims Processing/DIP Financing	\$600,000.00	\$600,000.00	\$650,000.00	\$654,814.00	\$654,814.00	\$654,814.00
Fuel Rebate			\$130,000.00			
<b>Total Cash Collections</b>	\$600,000.00	\$ 600,000.00	\$780,000.00	\$ 654,814.00	\$ 654,814.00	\$ 654,814.00

**Expenses**

**Weekly Expenses**

Driver Payroll (Logistics)	\$200,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$200,000.00	\$200,000.00
Payroll - Zlatan Karic (Express)	\$2,696.15	\$2,696.15	\$2,696.15	\$2,696.15	\$2,696.15	\$2,696.15
Payroll - Daniel Ivandic (Express)	\$1,800.00	\$1,800.00	\$1,800.00	\$1,800.00	\$1,800.00	\$1,800.00
Office Payroll (Karic and Ivandic excluded--Express)	\$15,503.85	\$15,503.85	\$15,503.85	\$15,503.85	\$15,503.85	\$15,503.85
Fuel	\$280,000.00	\$225,000.00	\$225,000.00	\$225,000.00	\$225,000.00	\$225,000.00
<b>Total Weekly Expenses</b>	<b>\$ 500,000.00</b>	<b>\$ 445,000.00</b>	<b>\$ 445,000.00</b>	<b>\$ 445,000.00</b>	<b>\$ 445,000.00</b>	<b>\$ 445,000.00</b>

**Monthly Expenses**

Bosnia Payroll per contract with United Balkan	\$50,000					\$50,000
GL Insurance			\$135,000.00			
Cargo Insurance			\$33,000.00			
Health Insurance	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00	\$10,000.00
Credit Card (AT&T)	\$650.00					\$650.00
Credit Card (Spectrum)	\$360.00					\$360.00
Credit Card (TXU - Electricity)	\$2,500.00					\$2,500.00
Credit Card (Atmos - Gas)	\$400.00					\$400.00
Credit Card (Expense Reimbursements)	\$19,022.50	\$19,022.50	\$19,022.50	\$19,022.50	\$19,022.50	\$19,022.50
Rent for Shop	\$4,600.00					\$4,600.00
MHC (Parts for Kenworth Trucks)	\$16,250.00	\$16,250.00	\$16,250.00	\$16,250.00	\$16,250.00	\$16,250.00
TNW Tire	\$6,250.00	\$6,250.00	\$6,250.00	\$6,250.00	\$6,250.00	\$6,250.00
FleetPride	\$2,125.00	\$2,125.00	\$2,125.00	\$2,125.00	\$2,125.00	\$2,125.00
EFS (break down on the road)	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00	\$25,000.00
Offen Oil	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00	\$2,000.00
Williamson Tire	\$2,500.00	\$2,500.00	\$2,500.00	\$2,500.00	\$2,500.00	\$2,500.00
Drivers Wash	\$1,250.00	\$1,250.00	\$1,250.00	\$1,250.00	\$1,250.00	\$1,250.00
Southwest Intl.	\$1,750.00	\$1,750.00	\$1,750.00	\$1,750.00	\$1,750.00	\$1,750.00
SNJ TRL Repair	\$750.00	\$750.00	\$750.00	\$750.00	\$750.00	\$750.00
Other Expenses	\$18,750.00	\$18,750.00	\$18,750.00	\$18,750.00	\$18,750.00	\$18,750.00
<b>Total Monthly Expenses</b>	<b>\$ 164,157.50</b>	<b>\$ 105,647.50</b>	<b>\$ 273,647.50</b>	<b>\$ 105,647.50</b>	<b>\$ 105,647.50</b>	<b>\$164,157.50</b>

**Compass Loan- FN1**

**\$35,416.67**

**\$25,000.00**

**Truck and Trailer Payments**

M&T Capital						\$33,295.75
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PNC									\$20,171.50
BMO									\$3,611.41
Triumph									\$4,608.40
Truist									\$9,748.95
Huntington									\$1,360.57
Wells Fargo									\$2,266.22
Wallwork Financial Corporation									\$1,467.89
Sumitomo Mitsui Finance									\$1,611.32
Navistar Financial Corporation									\$2,329.12
Mitsubishi HC Capital America									\$3,343.65
Hyundai Translead Trailer Finance									\$1,190.98
De Lage Landen Financial									\$1,425.94
Daimler									\$6,357.37
Volvo Financial Services									\$7,555.92
MHC Financial Services									\$5,295.78
<b>Total Truck and Trailer</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$105,640.77</b>	
<b>Bankruptcy Costs</b>									
Legal Fees - FN2	\$	-	\$	-	\$	-	\$	-	\$100,000.00
US Trustee Fees - FN3									\$
<b>TOTAL BANKRUPTCY COSTS</b>	<b>\$</b>	<b>-</b>	<b>\$</b>	<b>-</b>	<b>\$</b>	<b>-</b>	<b>\$</b>	<b>-</b>	<b>\$100,000.00</b>
<b>TOTAL EXPENSES</b>	<b>\$</b>	<b>699,574.17</b>	<b>\$</b>	<b>550,647.50</b>	<b>\$</b>	<b>718,647.50</b>	<b>\$</b>	<b>550,647.50</b>	<b>\$</b>
<b>Net Cash Position Weekly</b>	<b>\$</b>	<b>(99,574.17)</b>	<b>\$</b>	<b>49,352.50</b>	<b>\$</b>	<b>61,352.50</b>	<b>\$</b>	<b>104,166.50</b>	<b>\$</b>
<b>Cumulative Cash Position</b>	<b>\$</b>	<b>30,425.83</b>	<b>\$</b>	<b>79,778.33</b>	<b>\$</b>	<b>141,130.83</b>	<b>\$</b>	<b>245,297.33</b>	<b>\$</b>

FN1 - \$100,000.00 monthly payments during Interim Period by Agreement with Compass

FN2 - Legal fees will not be paid until fee procedures are approved by the Court, therefore--Legal fees are included in budget but excluded from cumulative cash position during this interim period

FN3 - U.S. Trustee Fees will be paid as required